

ATTACHMENTS SECTION "A"

(Rev. 4/97)

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

SHANE K. Hopkins

(Enter above the full name of the plaintiff in this action)

v.

CORRECTIONAL OFFICER T. Lusey,
CORRECTIONAL OFFICER T. SMITH,
CPT. J. M. MERSER,
DEPUTY WARDEN DAVID E. PERCE, JR.,

Civil Action No. _____

JURY TRIAL DEMAND
CLASS CERTIFICATION

(Enter above the full name of the defendant(s) in this action)

ATTALY OF DELAWARE JUDITH MULLEN, DREWERY NASH FENWELL,
ATTORNEY GENERAL OF DELAWARE M. JANE BRADY

I Previous lawsuits

A. Have you begun other lawsuits in state or federal courts dealing with the same facts involved in this action or otherwise relating to your imprisonment?
YES [] NO

B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs N/A

Defendants N/A

2. Court (if federal court, name the district; if state court, name the county)

N/A

3. Docket number

4. Name of judge to whom case was assigned

N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

6. Approximate date of filing lawsuit

N/A

7. Approximate date of disposition

N/AII. A. Is there a prisoner grievance procedure in this institution? Yes [] No []B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes [] No []

C. If your answer is YES,

1. What steps did you take?

FILED GRIEVANCE ONCE I WAS RELEASED FROM ISOLATION CONFINEMENT

2. What was the result?

RETURNED AS EXPIRED FILING PERIOD (SEE EXHIBIT "A")

D. If your answer is NO, explain why not

N/A

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities? Yes [] No []

F. If your answer is YES,

1. What steps did you take?

N/A

2. What was the result?

N/A

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff SHANE K. HOKINS #00253918
 Address 1181 Gaddock Road Dcc-She. Smyrna DE 19971-967

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the names, positions, and place of employment of any additional defendants.)

B. Defendant John Bussey is employed as Corrections Officer at DCC-MHU-Smyrna DE 19971-967

C. Additional Defendants Obi J. Smith Coe. Off. Re: C. J. M. M. M. 2500
Cori Evans DE Personal; Deputy Warden DE Personal,
*AGLU of DE 19971-967, Judith Mullen and
Dewey Nash Fennell Esq.; Attorney General M.
JANE Brady.

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

Turisdiction

1.) This Court has Jurisdiction over Plaintiffs Federal Claims Pursuant To 28 USC 331331 AND 1343(A)(3) AND ALSO STATE Law Claims Pursuant To 28 USC 3136M.

CONT (2) ➔

*AGLU of DE Add. is:
 100W. 10th St Wilm. Del 19801 #309 -3-
 19801

** M. JANE Brady Add. is:
 820N. French St 11th floor
 Wilm. Del 19801

Cont 3(2)

ComplaintVENUE

2.) The District Court of Delaware is an appropriate venue under 28 U.S.C. § 1331(b)(2) because the substantial part of the events or omissions giving rise to the claims occurred in this district.

Parties

3.) Plaintiff, Shane K. Hopkins throughout the incidents hereinunder is an inmate at the Delaware Correctional Institution as an sentenced defendant serving a valid sentence order pursuant to 11 Del.C. § 3903 at the aforesaid institution.

4.) Defendant, Cont. Qusey was at all times herein employed as a Correctional Officer at the Delaware Correctional Institution and on November 26, 2004 did use excessive force upon Plaintiff Shane K. Hopkins in violation of 11 Del.C. § 468(5). And in furtherance thereof assaulted Plaintiff in violation of 11 Del.C. § 1254 by striking Plaintiff numerous times with a closed fist and ramming Plaintiff's head into a cement wall while restrained.

CONTO.8

Complaint

IN Hand Cuffs And did Conspire To furtherance
of The aforesaid, With another Corrections officer
Cpt. Smith in Violation of 11 Del. C. § 51253 And
did MAKE direct THREATS upon Plaintiff, If Plaintiff
Complained To Prison officials. All While ACTING under STATE
Jaws Code of Conduct, AND STATE Code, Code of Conduct.*

5.) Defendant Cpt. Smith WAS AT ALL TIMES
HEREIN employed AS A Corrections officer AT THE DEL-
AWARE Corrections INSTITUTION AND ON November 26,
2004 did USE EXCESSIVE force upon Plaintiff CHANE
K. Hopkins in Violation of 11 Del. C. 468(5) And in fur-
-therence THEREOF Assaulted Plaintiff in Violation of
11 Del. C. 31254 by STRIKING Plaintiff Numerous Times
With A Closed fist AND RAMMING Plaintiff's HEAD into
A CEMENT WALL While RESTRAINED in HANDCUFFS AND did
Conspire To furtherance of The aforesaid With Defendant
Cpt. Ousey in Violation of 11 Del. C. § 51253
And did MAKE combined directed THREATS towards PLA-
INTIFF, If Plaintiff Complained To Prison officials
All While ACTING under STATE Jaws Code of Conduct AND
STATE Code, Code of Conduct.*

* 10 Del. C. § 4001 thru 4010

(CONT'D.) Complaint

(6.) DEFENDANT Col. J.m. Meeson WAS AT ALL TIMES HEREIN EMPLOYED AS A GRIEVANCE ASSIGNMENT DIRECTOR AT THE DELAWARE CORRECTIONAL INSTITUTION AND ON DECEMBER 20, 2004 DID DENY THE SUBMISSION OF A GRIEVANCE AND DID NOT PROVIDE A REAL FORM TO APPEAL A GRIEVANCE DECISION IN VIOLATION OF 42 USC § 1997 AND DID CONSPIRE IN FURTHERANCE OF AN EXCESSIVE USE OF FORCE CLAIM AND KNOWINGLY MADE FALSE STATEMENTS IN THE COURSE OF ACTIONS TO PREVENT THE DISCLOSURE OF A STATE LAW VIOLATIONS AS INCORPORATED IN BOTH THE FACTUAL AND INVESTIGATORY PROCESS OF THE GRIEVANCE SUBMISSION AND ACCESS OF GRIEVANCE PROCESS OF A CLASS OF PERSONS WHILE IN ISOLATION STATUS AND DID IN A MANNER CONSISTANT TOWARDS PREVENTING DISCLOSURE OF ASSAULTS UPON A CLASS OF INMATES IN THE SHU (SECURITY HOUSING UNITS) FROM 2001 TO DATE IN VIOLATION OF (C.R.P.A.) 42 USC § 1997 AS A CONTINUED PATTERN OF RETECTIONS OF GRIEVANCES SUBMITTED BY NUMEROUS INMATES IN THE SAME MANNER AS EVIDENCED IN PLAINTIFFS GRIEVANCE (SEE EXHIBIT A)

(6)
(4)

Cont. Q.(5)Complaint

7.) Defendant Deputy Warden David E. Spruce, Jr., did AT ALL TIMES herein Employed AS A RESPONDENT Superior OVER Plaintiff And DEFENDANTS and did on December 30, 2004, INSTITUTE AN INVESTIGATION INTO THE ALLEGATIONS AS CONTAINED IN EXHIBIT 'A' AND did THEREAFTER ATTEMPT in furtherance TO PREVENT disclosure of ADVANCED CLAIMS AND REQUESTS for Criminal Charges, by THE DIRECT ACTS, from 12-30-04 TO DATE, WHILE EMPLOYED AT DELAWARE CORRECTIONAL INSTITUTION AND ACTING UNDER STATE LAWS AND CODE OF CONDUCT AS RESPONDENT SPRUCE.*

* 8.) Defendants AC.LU. of DELAWARE Judith Mullen Esq. AND Drewry Nash Frankell AT ALL TIMES herein did MAINTAIN IN file No. 02-22 Numerous Allegations of A PATTERN of CONJUNTED ASSAULTS UPON Plaintiff AND Numerous OTHER INMATES AT DELAWARE CORRECTIONAL INSTITUTION AND did KNOWINGLY AWARE of PREVENT, Hinder The Disclosure of ON-going CRIMINAL CONDUCT IN VIOLATION of 42 U.S.C. § 1997 CRIM. VIOLATIONS TO THE DEPARTMENT OF JUSTICE IN VIOLATION

(7)
(B)

*See Exhibits C'

CONT. Q.(8) Complaint

of Delaware Rules of Professional Conduct 8.4(d) And waives of file: 02-22 Submission(s) for National funding and Investigatory Process, that allowed for on-going, violations of Numerous INMATES, ASSAULTS AND EXCESSIVE USE OF FORCE INCIDENTS from 2002 to date 'NOT' to be disclosed or Investigated by The STATE of DELAWARE ATTORNEY GENERAL'S OFFICE or The Civil Rights Division of The UNITED STATES ATTORNEY GENERAL INVESTIGATORY Process under 42 U.S.C. § 1997 CR.G.A (Civil Rights Institutions Persons Act) (SEE Exhibit D)

9.) DEFENDANT DELAWARE ATTORNEY GENERAL M. JANE BRADY WHILE AT ALL TIMES herein deny Plaintiff ACCESS TOWARDS STATE LAWS Claims Against defendants AND did fail TO Respond To 02 INSTITUTE INVESTIGATORY Process of STATE LAW Claims Against DEFENDANT While housed AT THE DELAWARE CORRECTIONAL INSTITUTION AND KNOWINGLY AWARE OF THE Aforesaid INCIDENT fail To Prevent or uphold Criminal Conduct of STATE ACTORS WHILE AS THE ATTORNEY GENERAL OF THE STATE OF DELAWARE during THE afores-

CONT Q.9

Complaint

Said Time Periods of 2002 TO DATE (SEE EXHIBIT E)

Factual Allegations

10.) ON November 26, 2004 defendants Cbsr. T. Busey and Cbsr. T. Smith did assault Plaintiff as contained in Plaintiff's attached affidavit as (EXHIBIT B) and did cause, injury in the performance of duties in violation of STATE LAW(S) and did make direct threats upon Plaintiff and did conspire against Plaintiff to stop prevent or allow Plaintiff to report the incident in a manner that displays continued pattern of acts against Plaintiff and other inmate(s) in combined effort that was illegally done in violations of STATE and FEDERAL LAWS.

Plaintiff's statement of claim is attached.

Within the affidavit aforesaid and work.

Submit it as allegations of factual content.

or claims herein (as statement of facts")

11.) ON December 17, 2004 Plaintiff

(9)

COMPLAINT

Submitted A COMPLAINT DATED FOR THE NOVEMBER 26, 2004 INCIDENT AND CONTAINED WITHIN THE COMPLAINT THE REASONS FOR NOT BEING ABLE TO TIMELY FILE A COMPLAINT WITHIN THE 7 DAY TIME PERIODS DUE TO DENIAL OF ACCESS BY ANY INMATE WHO IS ON ISOLATION STATUS TO A PEN, PAPER, BIBLE, JEWEL BOXES, COMPLAINT ITEMS BY THE DIRECT ACTIONS OF DEFENDANT Col. J. M. MORSE WHO IS AWARE OF AND IS RESPONSIBLE FOR THE COMPLAINT PROCESS AT DELAWARE CORRECTIONAL INSTITUTION FROM 2002 TO DATE AND KNOWINGLY AWARE OF OTHER INMATES DENIED OF ACCESS (TO COMPLAINTS WHILE UNDER 15 DAY ISOLATION STATUS AS EVIDENCED BY PLAINTIFF'S CLAIM(S) DE NOB UPON EXHIBIT 'A' HEREIN AS STATED THEREIN UNDER. PLAINTIFF'S CLAIMS ARE FOUNDED AS INVESTIGATED AS CONTAINED IN EXHIBIT 'A' (INTENT AND CONTEXT OF CLASS ACTION BASED CLAIMS FROM 2002 TO DATE).

12.) From 2002 to date BOTH DIRECTORS OF A.C.U. OF DELAWARE did PREVENT THE disclosure OF ON-GOING CIVIL RIGHTS VIOLATIONS TO BE PRESENTED

GTO.(9)

Complaint

THE U.S. DEPARTMENT OF JUSTICE CIVIL RIGHTS DIVISIONS AS AN on-going C.E.T.P.A. VIOLATION OF BOTH STATE AND FEDERAL LAWS.

13.) DELAWARE ATTORNEY GENERAL M. JANE Brady did from July 2, 2005 To DATE did NOT Respond To Allegations Of STATE LAW VIOLATIONS AND OR INVESTIGATORY PROCESS INTO THE ASSAULT OF PLAINTIFF.

14.) Civil Assault

PLAINTIFF REALLEGES PARAGRAPHS 4-5.

15.) This is A CIVIL ACTION brought by SHANE K. HOPKINS for ASSAULT AGAINST CORRECTIONAL OFFICERS J. Pusey AND J. Smith.

16.) DEFENDANTS PUSEY AND SMITH ACTED IN CONSPIRACY TOWARDS VERBAL THREATS AND PHYSICAL ASSAULT UPON PLAINTIFF AND DID SO WHILE ACTIONS COMPLAINED OF WERE DONE UNDER THE COLOR OF STATE CODE AND IN PERFORMANCE OF THEIR STATUTORY DUTIES.

II
(A)

GND (12)

Complaint

17.) THE ACTIONS OF ASSAULT REFERRED
TO IN PARAGRAPHS 4-5 WAS DONE AND UTTERED BY
Pusey AND Smith WITH THE DELIBERATE INTENT TO
CAUSE BODY HARM AND TO FRIGHTEN PLAINTIFF, BY
THE THREAT BOTH Pusey AND Smith CREATED REASON-
-ABLE AND REAL APPREHENSION OF FEAR AND BODY
HARM IN THE MIND OF PLAINTIFF IN THAT BOTH Pusey
AND Smith PRESENTED THE ABILITY TO INFIL ASSAULT
UPON PLAINTIFF AND DID SO WITHOUT REGARD TO THE
24 OTHER INMATES WHO WITNESSED THE ASSAULT
OF PLAINTIFF.

18.) THE ASSAULT AND THREATS UPON
PLAINTIFF MADE AND COMMITTED BY BOTH Pusey
AND Smith, BOTH ACTING AS AGENTS OF DEPARTMENT
OF CORRECTIONS WERE WILFUL, WANTON AND MALICIOUS,
THESE ACTS AND THREATS CAUSED PLAINTIFF SEVERE
MENTAL ANGUISH AND EMOTIONAL DISTRESS BY PUTTING
HIM IN A STATE OF FEAR AND APPREHENSION, WHICH IN
TURN, HAD A SEVERELY DETERIMENTAL EFFECT UPON HIS
LIFE AND GENERAL WELL-BEING AND IMPAIRED HIS ABILITY
TO MANAGE HIS AFFAIRS OR BE RELEASED ON _____

(12)

GNT Q. (B)

Complaint

from State To Mike Housing Were both defendants
ARE EMPLOYED AND WERE THE INCIDENT OF ASSAULT AS
STATED HEREIN HAPPENED.

Psychical INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

A.) CORRECTIONAL OFFICERS J. Pusey
AND J. Smith REALED IN Paragraphs 4-5.

20.) THIS IS AN ACTION brought by
SHANE K. HOPKINS AGAINST GOS Pusey AND Smith
FOR INTENTIONAL INFILCTION OF PSYCHICAL EMOTIONAL
DISTRESS.

21.) BOTH GOS Pusey AND Smith
OCCUPIED A UNIQUE POSITION WITH REGARD TO
11 DEL. CODE § 408(5) ACTED IN AN EXTREME AND
OUTRAGEOUS MANNER TOWARDS PLAINTIFF AND
GOS Pusey AND Smith CONDUCT DESIGNED AND
INTENDED TO INFIL SEVERE EMOTIONAL DISTRESS
ON PLAINTIFF AND DEFENDANTS WAS THE DIRECT AND
PROXIMATE CAUSE OF PSYCHICAL SEVERE EMOTIONAL
DISTRESS SUFFERED BY PLAINTIFF.

(13)

(CONT 3(12))

ComplaintCount I: Violation of Constitutional RightsCompensatory Damages

22) Defendants ^{cb}J. Busey And ^{cb}J. Smith as Plaintiff incorporates herein by reference the allegations contained in Paragraphs 4-5 The Intentional beatings of Plaintiff by Defendants Busey and Smith violated the rights of Plaintiff as guaranteed by the fourth, fifth and eighth Amendments to the United States Constitution, for which defendant officers are individually liable.

Count II: Violation of Constitutional RightsExemplary Damages

23) Defendants ^{cb}J. Busey and ^{cb}J. Smith as Plaintiff incorporates herein by reference the allegations contained in Paragraphs 4-5 The Intentional beatings of Plaintiff by Defendants Busey and Smith when Plaintiff was handcuffed, unarmed and did not pose a threat of death or grievous bodily injury to defendants, when defendants had no lawful auth-

(12)

Cont 3(15)

Complaint

ORITY TO USE NON-deadly force against Plaintiff
 WAS DONE WITH ACTUAL MALICE TOWARD PLAINTIFF AND
 WITH WILFUL AND WANTON INDIFFERENCE TO AND DELIB-
 ERATE DISREGARD FOR THE CONSTITUTION RIGHTS OF
 PLAINTIFF

COUNT III: Violation of Statutory Civil Rights
Compensatory Damages:

24.) DEFENDANTS C.J. RUSSELL AND C.J.
 SMITH AS PLAINTIFF INCORPORATES HEREIN BY RE-
 FERENCE THE ALLEGATIONS CONTAINED IN PARAGRAPHS 4-5
 THE INTENTIONAL BEATINGS OF PLAINTIFF BY DEFEN-
 DANTS RUSSELL AND SMITH WHEN PLAINTIFF WAS UNARMED
 AND DID NOT POSE A THREAT OF DEATH OR GRIEVOUS BODILY
 INJURY TO DEFENDANTS OR OTHERS, WHEN DEFENDANTS HAD
 NO AUTHORITY TO USE NON-deadly force AGAINST PLAINTIFF
 WAS DONE WITH ACTUAL MALICE TOWARD PLAINTIFF AND
 WITH WILFUL AND WANTON INDIFFERENCE TO AND DELIBERATE
 DISREGARD FOR THE STATUTORY CIVIL RIGHTS OF PLAINTIFF

COUNT IV: Conspiracy to Violate Civil Rights
Compensatory Damages

25.) DEFENDANTS C.J. RUSSELL AND C.J.

Cont Q.(16)Complaint

Smith As Plaintiff Incorporates herein by Reference the Allegations contained in Paragraphs 4-5 and 10 defendants Russey and Smith Conspired To Violate Plaintiffs Statutory Civil Rights as in Violation of 42 USC §1983 and §1997 for which defendants Russey and Smith are Individually liable.

Count II: ASSAULT AND BATTERY

Compensatory damages

26.) Defendants Cpl. Russey Cpl. Smith As Plaintiff Incorporates herein by Reference the Allegations contained in Paragraphs 4-5 THE BEATINGS, Verbal Abuse and use of Non-deadly force by defendants ^{ob} Russey ^{ob} and Smith when defendants were NOT in imminent danger from Plaintiff was without justification or Proportionation was excessive and constitutes assault and battery for which defendants Russey and Smith are Individually liable.

Count VI: ASSAULT AND BATTERY

Exemplary damages

27.) Defendants Cpl. Russey and

(16)

Cont'dComplaint

Cpl. J. Smith INcorporates herein by Reference the Allegations CONTAINED IN Paragraphs 4-5 THE BEATINGS AND Verbally Abused Plaintiff IN A MANNER THAT WAS EXTREME, OUTRAGEOUS AND UNJUSTIFIED AND CAUSED Plaintiff TO Suffer Physical AND Non-Deadly Force AGAINST Plaintiff, WAS done WITH WILFUL AND WANTON INDIFFERENCE TO AND DELIBERATE disregard FOR HUMAN LIFE AND THE RIGHTS OF Plaintiff.

Count VII: INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS
Compensatory DAMAGES

28.) Defendants Cpl. J. Pusey Cpl. J. Smith AS Plaintiff INCORPORATES herein by Reference THE ALLEGATIONS CONTAINED IN Paragraphs 4-5 defendant Cpl. Pusey AND Cpl. Smith INTENTIONALLY BEAT AND Verbally Abuse Plaintiff IN A MANNER THAT WAS EXTREME, OUTRAGEOUS AND UNJUSTIFIED AND CAUSED Plaintiff TO Suffer Physical AND EMOTIONAL DISTRESS FOR WHICH DEFENDANT Pusey AND Smith ARE INDIVIDUALLY LIABLE.

Count VIII: INTENTIONAL INFILCTION EMOTIONAL DISTRESS
EXEMPLARY DAMAGES

29.) Defendants Cpl. J. Pusey Cpl. J.

Persons Acting in Concert or Cooperation With them
from further Violating The Rights, Privileges and Immunities
GUARANTEED TO THE PLAINTIFF Under The Constitution
of The UNITED STATES of AMERICA;

- B.) GRANT COMPENSATORY DAMAGES TO PLAINTIFF
IN THE SUM OF \$ 400,000.00 dollars
- C.) GRANT PUNITIVE DAMAGE IN THE SUM OF
2.4 Million dollars.
- d.) GRANT PLAINTIFF HIS COSTS OF THIS
ACTION, INCLUDING REASONABLE ATTORNEY FEES.

Dated: _____

X

SHANE K. HOPKINS
PROSE PLAINTIFF
1181 Redhook Rd 17A
Smyrna Delaware
19997-96

I declare under PENALTY of Perjury THAT
THE foregoing is TRUE AND CORRECT

X
SHANE K. HOPKINS Pro

MAY 4, 2005

ASSISTANT DEPUTY WARDEN DR. PIECE
MAJOR, DAVE HOLMAN

Dee. Sp.

Dee. Smyrna - Shu - MHC units

Re: GRIEVANCE # 9907 ADULT OF INMATE.

I AM REQUESTING THAT YOU NOTIFY ME
OF THE OUT-COME OF MY REQUEST-GRIEVANCE
AS TO THE ASSESSMENT UPON MY PERSON AS STATED
IN THE GRIEVANCE 9907 AND DEPUTY WARDENS
D.R. Piece REQUEST AT TOP OF GRIEVANCE FOR
YOU TO ASSIGN SUPERVISOR (OTHER THAN J. BOONE)
TO INMATE. THE ALLEGATIONS THEREIN.
PLEASE NOTIFY ME ACCORDINGLY.

Sincerely yours,

X

SHANE HOPKINS

#00253918

Shu. 17A84

cc: file

cc: Colm F. Connolly Reg.

May 30, 2005

ON DE. Pierce

Re: Reply To Your Memorandum of 5-18-05

One Sie:

Thank you for responding to my written request (once again show me f-jarrec
D.O. has no f-dote on it) received on 5-9-05
as to Civil # 9907 disposition I would like
you to know that 'no' one has spoken to me
about this grievance or another addendum
grievance # 9908 since they were filed and
I would also note that I was denied access
to anything during the time period I was
held in isolation status, thus, I filed
as soon as could obtain my property back.
I say this because it is a common
custom or practice to deny anyone in
isol. status a pen or Civil(s).

I would also note that B.O. and
C.F.R. on griev. procedure will show that
no process now could be timely as the
griev(s) are more than 180 days old.
Please notify me who's investigating these.

Sincerely yours
John H. Hart

JUNE 12, 2005

(2)

Deputy Marshal
DAVID E. PIERCEDONE - SENT
6-13-07Re: Reply to You June 2, 2005 Ref: Griev. # 9907
And 9908,

Dear Sir/DW. DEP. Pierce:

Presumptively, When You ordered AN INVESTIGATION ON 12-30-04, by The Attested NOTATION AT THE TOP of GRIEV. # 9907 You INSTITUTED A DOPRATE AND distinguishing Inquiry out-Side of AND INCLUDING THE RESTRICTED REASONS STATED on The BACK of THE ORIGINAL GRIEVANCE DATED 12-20-04 BY Cpl. J. M. MORSON. My Inquiry Specifically Asked of You Who WAS ASSIGNED To INVESTIGATE the MATTER upon THE AFORESAID. Since, I've NOT Spoken JS ANY ONE About This AT ANY POINT Thus-Far. I would Request of You or MAYBE DAVE HEDMAN To NOTIFY ME Accordingly.

I AM REQUESTING AN INVESTIGATION AND CRIMINAL CHARGES HENCEFORTH.

xc:file

Sincerely yours,

X
SHANE K. HOPKINS
00253918 STEPHALY

MAY 12 2005

Warren T. Carroll
DCC-Smyrna

Re: Request To View medical file

I NEED TO VIEW MY MEDICAL ^{file} ASTO AN INCIDENT
ON 11-25-2004 IN ORDER TO SEE WHAT WAS
DONE AND WHAT I NEED TO ASK FOR BOTH
MEDICAL AND PSY. TESTS ASTO CONDITIONS I
AM HAVING AS A RESULT. AND TO OBTAIN NAMES
TO WRITE TO IN ORDER TO ASK FOR ASSISTANCE.

X
Shane Hopkins
#0253918 17AKH/SH

Done 5-12

MAY 16, 2005

Colm F. Connolly, Esq.,
U.S. ATTORNEY
1007 ORANGE STREET STE 700
P.O. Box 2046
Wilmington Delaware 19899-2046

Re: Request for Criminal (R.I.P.A. Investigation
And 5 U.S.C. § 552 FOIA*

Dear Counsel:

ATTACHED HEREIN IS AN INCIDENT THAT
I AM REQUESTING YOUR OFFICE CONDUCT AN INVESTIGATION
OF UNDERSCRIP. A 42 USC §1997 PRESSIONS, IN THAT
THE INCIDENT IS AN ON-GOING PATTERN OF CONDUCT THAT
IS RELATED TO FILE NO. 62-22 OF THE DELAWARE ACT. U.
BASED ON THE SAME ILLEGAL CONDUCT OF STATE OFFICIALS
UPON INMATES. I WOULD REQUEST THAT CRIMINAL CHARGES
BE INSTITUTED HEREOFORTH.

I Would Also Request under *Freedom of Information Act Request THAT You disclose The Number of ASSAULT CASES Your dept. HAS INVESTIGATED in The Past 5YRS. This would be An Request for The Names of Victims and Correctional officers Involved.

3 Nkade M. Davis,

X-
SHANE K. HOPKINS
0053918 17 ALH
1181 Jackson Rd
Smyrna DE 19977-9619
(C: 312-555-1234 O: 312-555-1234 F: 312-555-1234)

1904

~~2002-11-11 3:45~~

MAY 20, 2005

Colm F. Connolly Esq.
UNITED STATES ATTORNEY
1007 ORANGE STREET
STE 700
P.O. Box 2046
Wilmington, Delaware 19899-2046

Done ✓
5-16-05
W

Re: 2nd ATTEMPT AND INTERFERENCE OF ACCESS TO
ASSET A CR.I.P.A Violations

Dear U.S. Atty Connolly:

ON/BEFORE 5-16-05 I
Submitted THE ATTACHED LETTER TO THE JAIL LIBRARIAN
STATE PERSONNEL BRIAN ENGRAM, FOR COPY SERVICE,
ATTACHED TO IT WAS GRIEVANCE(S) # 9907 AND 9908
AND A 5-5-05 LETTER TO DEPUTY WARDEN D.E.
PIECE JR., BRIAN ENGRAM REFUSED TO COPY THE
Aforesaid AND THEN ON 5-10-05 I RECEIVED ALL BACK
WITH A MEMO FROM BRIAN ENGRAM DENYING TO COPY
THE GRIEVANCES AND LETTER SAYING,

"LETTERS TO STAFF AND GRIEVANCES ARE NOT
CONSIDERED LEGAL DOCUMENTS."

ON 5-10-05 ^{THE SAME DAY} I AGAIN, WROTE BRIAN ENGRAM, ASKING
HIM WHAT, POLICY OR PROCEDURE OR CUSTOM, HE IS
APPLYING IN DENYING ME TO DOCUMENT LEGAL

ATTACHMENTS TO SUPPORT my CLAIMS TO YOU
UNDER CR.R.P.A. on 5-13-05 I AGAIN RECEIVED
"NO" REPLY AND THE SAME AFORESAID SUB-
MISSIONS BACK UNCOPIED.

I HAVE THUS, INSTITUTED A COMPLAINT AS TO
THE AFORESAID AND I HAVE ADVANCED THE ENCLOSED
AFFIDAVIT OUT-LINING THE ENTIRE INCIDENT AND UP
TO DATE PATTERN OF RETALIATORY ACTS, GESTURES
AND NOW THE AFORESAID ATTEMPT TO ASERT AND
NOTIFY YOUR OFFICE.

I WOULD REQUEST NOW, TO ADDENDUM MY
5-16-05 LETTER TO INCLUDE DENIAL OF ACCESS
TO THE COURTS BASED ON MY UNDERLYING CR.R.P.A.
VIOLATIONS AND YOU HINDERING MY ACCESS TO THE
COURTS VIA, YOUR OFFICE, IN WHICH, I WISH FOR AN
INVESTIGATION PATTERN OF INCIDENTS DOCUMENTED
IN CASE NO. 02-22 WITH THE A.C.L.U. OR D.E.
SINCE 2002. I DEMAND THAT YOUR OFFICE
CONDUCT A CR.R.P.A. INVESTIGATION AND I
AUTHORIZE YOU TO OBTAIN MYEN AND OTHER
INMATES SUBMISSIONS TO THE A.C.L.U. UNDER
CASE NO. 02-22. THE AMOUNT OF SUBMISSIONS

CONTAINED THREE INCIDENTS 'WOULD' WARRANT A FEDERAL INVESTIGATION AND I WOULD ALSO QUESTION ALSO AS TO FEDERAL CIVIL RICO VIOLATIONS ATTACHED TO THESE INCIDENTS BY PRIVATE AND STATE ENTITIES OVER THE PAST 4 yrs. UPON NOTIFICATION FROM YOU I WILL ADVANCE, MY GRIEVANCES AND OTHER DOCUMENTATION(S) TO SUPPORT MY CLAIM(S) AFORESAID. AND ASK THAT YOUR OFFICE CONSIDER THE AFORESAID THANK YOU FOR YOUR PROMPT ATTENTION THE AFORESAID.

Sincerely yours,

X

xc: file

cc: Hon. M. JANE Brady

DREWRY NASH FENNELL Esq. Sherr. Jay Dick

JANET EBAN ~~Dir. D.E.S.~~

ATTACHMENT(S) 2 () PAGE AFFIDAVIT OF C.R.I.C.A. VIOLATIONS

ONE (1) PAGE AFFIDAVIT
ADD ONE (1) PAGE NUMBER(S)
AMOUNTS (FDE).

AND 5-16-05 JETTE
~~RECEIVED~~

7-5-05
RE DONE
RE COPY — This 6-20-05
JATTS 10

Colm. F. Connolly Esq.

Re: ATTACHED LETTERS/Copies

Dear Sir:

I WANT YOU TO SEE THE AMOUNT OF TIME IT TOOK BETWEEN WRITING my first LETTER TO YOU TO THE ABOVE DATE AND I WANT YOU TO KNOW:

1.) Brian Engelm of the Jawibesey here did upon NOTKING my Complaint WAS RELATIVE TO AN ASSAULT upon my Ocean did

A.) START A CAMPAIGN of DELAYS demands AND ON-RIGHT Restitution Nexus TO ASK THESE TO YOU.

B.) has on-going of Rejabesey ACTS for MY EVEN ATTEMPT TO TELL YOU ACTU. ETC of THESE ACTS.

I would hope that you CAN make A COPY of THIS ABOVE 6-20-05 AND RETURN TO ME WITHIN 10days Receipt of the REVENGE Local Mailing I AM SENDING VIT ANOTHER INMATE SO I KNOW IT GETS TO YOUR OFFICE AND WHEREUPON YOU CAN REPLY Accordingly,

xc: file

cc: AGCU of DC
MARIE BEAUCHAMP
MARIE A. OGDEN-KEESEY, U.S. DEPT. OF JUSTICE (WASH. D.C.)

Sincerely yours
X

Shane Notkino

August , 2005

Colm F. Connolly Esq.
U.S. ATTORNEY
1007 ORANGE ST. STE 700
Wilmington, DELAWARE 19899-

RE: ATTACHED 2ND NOTIFICATION AND CRIPA INVESTIGATION

Dear Sir:

On 6-20-05 I mailed to you the enclosed filing. I've NOT heard from you and my family contacted your office and was told no Certified mailing had been received by your office.

I AM AGAIN ENCLOSED AND MAIL BY CERTIFIED MAIL THE SAME INFORMATION IN ORDER TO OBTAIN A DISPOSITION INTO MY CRIPA VIOLATIONS INVESTIGATION REQUEST AFORESAID.

THANK YOU FOR YOUR ATTENTION IN THE MANNER HEREIN.

xc: f.p.

cc: Marie A. Bourke Esq. U.S. Dept. Justice
ATTACHMENTS: (5) MAILINGS . WASH. DC.

Sincerely yours,

X

SHANE HOPKIN
#00253918 17AL-4
1181 Frederick Rd
Smyrna, DE 19971
302-422-9671

LODGED IN THE U.S. POSTAL SERVICE
302-422-9671

November 18, 2005

Colm F. Connolly, Esq.
U.S. Attorney for Delaware
1007 Orange Street Ste. 700
P.O. Box 2046
Wilmington, Delaware
19899-2046

Do You HAVE MY
Photocopy? WELL
THEN GUESS WHAT
Asshole I MUST
HAVE Fucking Did
IT THEN Hah

Re: 2nd Request

Dear Counsel:

Since, I had a visit on, 10-4-05
By FBI. Agent B. Wise, I've written you, to request
A Copy, of The Agents Report. Submitted To
You AS TO The Investigatory Process Under
CRIPA. Enclosed, I would attach the
Report findings with the attached 2 affidavits
I done therefrom. Please forward me a copy
of The Agents Report or forward this to the
Agent to respond hereafter.

cc: Agent Brenda Wise, FBI, Office of Wilmington
ATTACHMENT(S): 2 Affidavits

Sincerely yours,

X
Shane K. Hopkins
#00253918 MALK
1181 Padlock Rd
Smyrna, Delaware
19999-9619

DECEMBER 27, 2005

Colm F. Connolly, Esq.,
U.S. ATTORNEY FOR DELAWARE
1001 ORANGE STREET STE. 700
P.O. BOX 2046
WILMINGTON, DELAWARE 19899-2046

RE: 3rd REQUEST: for Agent Wise Investigatory Report

Dear Counsel Connolly:

I HAVE NOT BEEN RESPONDED
TO AS TO THE ATTACHED LEGAL MAILING REQUESTING
A COPY OF THE REPORT OF F.B.I. AGENT B. WISE
DONE ON MY ASSAULT. PLEASE CHECK YOUR RECORDS
ACCORDINGLY.

THANK YOU FOR YOUR TIME AND HAVE A HAPPY
NEW YEAR.

xc: file

cc: FBI Agent B. Wise
Clerk U.S. Dist. Ct. D. Del.
Endorsements: 5 Pages

Sincerely yours,

X
X SHANE K. HOPKINS
#052539181 MA 14
1181 Padlock Rd.
Mynor, Delaware
9991796

Put NO DATE HERE

Check Box
U.S. DISTRICT COURT
844 King STREET Post Box 18
Wilmington, DELAWARE 19801

Re: Hopkins v. Qusey, et al., C.A. No.

Dear Clerk:

Enclosed, are Secure Copy(s) and
285 MARSHALL form(s) for Person(s) Named in
THE ORIGINAL COMPLAINT.

I would ask the Court to except
the enclosed mailed to the Court by another
INMATE due to the nature of the content and
allegations contained therein under and the mailing
is done in this manner, in order to assure the
Court's receipt thereof.

Thank you for your attention in the manner
herein.

xc: file DATED: _____

ATTACHMENTS: (7) COMPLAINTS SETS
(7) 285 MARSHALL FORMS

X
SHANE K. HOPKINS
#00253918 MA-4
1181 Oakbrook Rd
Smyrna, DE 19960
0200

December 5, 2005

Clerk Ron

U.S. District Court

844 King St. Post Box 18

Wilmington, Delaware 19801

Re: Enclosed filing and request to docket
and return to me cover page of
Complaint as Rec'd, P.T.

Dear Clerk:

Please allow this to be sent
by another I'm due to the nature of the
Complaint - and the fact that I don't
want to send it in my name due to
fear of it not getting to the court.

I have enclosed a cover page marked
in a pre stamped env. and I would ask
that you timestamp it in and return it
to me in the pre-add. env. and please
add the case #. assigned.

Thank you for your time herein.

xc:file

ATTACHMENTS: 1 original Complaint
1 Cover Sheet origin.
1 Informa brief 9215
1 Pre-Stamped Env.
w/cover complaint to
Time stamp in.

Sincerely yours,

X
SHANE K. HOPKINS
#00253918 17A14
1181 Packlock Rd
Smyrna, Delaware
9977

December 5 2005

Clerk

W. District Court
844 King St. Jack Box 18
Wilm, De 19801

1 Rewrite Both
2 Sign Dots 12/5/05
Complaints Post
Page.

Re: Enclosed filing

3 Return All To
me By Sun Eve.
mail out.

Dear Clerk:

Enclosed, Please find an original
and (1)one copy of which I want time
stamped in of complaint with Informa
paperis Dated of Post application.

Please time stamp in and return
to me my copy stamped time checked
front page as evidenced of your receipt
of my filing.

Due to the nature of the proceeding
I am sending this by another I'm not know
it will not be tampered with.

Thank you for your time for the enclosed

xc:file

ATTACHMENTS: 1 ORIGINAL COMPLAINT

1 ORIGINAL COVER SHEET

1 IN DEMAND FOR PAPERIS APPLICATION 1181 JACK BOX RD
1 RECOV. COVER PAGE TO FILE STAMPTO SHERIFFA. DE 1997.

Tracy E. Parks

X SJP

Shawna Hopkins

1 RECOV. COVER PAGE TO FILE STAMPTO SHERIFFA. DE 1997.

JANUARY 17, 2006

Clerk
U.S. District Court
844 King St. Post Box 18
Wilmington, Delaware 19801

Re: Hopkins v. Pusey, et al., C.A. No. 1:05-cv-870-SLR

Dear Clerk:

Enclosed is an "Amended" Informal
Proceedings Application, pursuant to the Courts
Order of January 2, 2006. Also I am requesting
that the Court send me a copy of the
docket and I've also enclosed my 28 USC
636e to forward time stamped back to
me so I can later send to counsel
for Defendants once an entry of appearance
has been effected. I've enclose a extra
copy for the Courts file.

Last, I would ask for an application
or for submission of my case to the Civil
Panel for appointment of counsel.

Thank you for your time

Sincerely yours,

cc: fts

ATTACHMENTS: 1 AMENDED INFORMAL
128 USC § 636e TO Plaintiff
TOMS TIME STAMPED IN
128 USC § 636e 12: FEB 12 2007 P-1181 P-1181

X
SHANK, Hopkins
#00-7244

July 2, 2005

Done 7-3-05

Hon. M. JANE Brady
Delaware Attorney General
820 N. French St. 12th Flr
Wilmington, Delaware 19801

Re: ATTACHED AND REQUEST FOR INTERNAL INVESTIGATION

Dear Attorney Gen Brady:

The Deputy Warden* has memo's
Grievances ETC. relative to the ATTACHED INCIDENT
of Criminal Conduct Against my Person AND on-going
CRIPA. VIOLATIONS AT SHU- MHU. AT DECK-SMYRNA.

I AM REQUESTING THAT SOMEONE FROM DEL.
S. POLICE CONTACT ME) HAKE-FOOTH AND THAT AN STATE
INDEPENDENT INVESTIGATION IS CONDUCTED. I HOPE TO
HEAR FROM YOU WITHIN 30 DAYS HAKE-FOOTH.

Shane K. Hopkins

xc: file

ATTACHMENTS(4)

* Del. Director, Jr.

** D Del C.S 4001 TO 4010

X
Shane K. Hopkins
0253918 17A/14
1181 Oddock Rd
Smyrna, Delaware
999-967C

July 2, 2005

Die. Atty. of Del. ✓
DREWRY NASH FENNELL Esq.

Date
7-2-05

Re: ATTACHED

I would like to address the reason why these materials/letters have taken so long to get to you. It is very simple Brian Englemon, Law Librarian O.C. St. tries to stop, prevent, hamper, delay filings by delayed withholding of legal filings for weeks at a time.

Please note the aforesaid and assign me an attorney from the Delaware division or Washington D.C. division to handle these matters hence forth and I need the current address of the former Delaware Atty. Die Judith Mullen Esq. Where she can be reached and I would ask of your office the pressing issues present for U.S. Atty's C.R.P.A. violation/investigation in to my assault.

Thank you for your assistance in the aforesaid.

Sincerely yours,

xc: file
ATTACHMENTS (4)

X
Shane K. Hopkins

DECEMBER 14, 2005

John J. Reed Esq.,
ATTORNEY AT LAW
EDWARDS & ANGELL, LLP.
1100 North MARKET STREET

Suite 1200
Wilmington, DELAWARE 19801-1246

Re: Request for Submission before Federal Civil Panel

Dear Counsel:

ATTACHED HERE TO WAS FILED ON 12-5-05
AND I WOULD ASK THAT YOU SUBMIT THIS TO THE
CIVIL PANEL, FOR THEIR REVIEW AND CONSIDERATION
FOR REPRESENTATION HENCE FORTH.

THANK YOU FOR YOUR TIME AND HAVE A NICE HOLIDAY
SEASON.

cc: file
cc: CLERK U.S. DISTRICT COURT (D. Del.)
ATTACHMENT(S) 3 Copies of Complaint
ONE FOR EACH MEMBER
OF THE PANEL.

Sincerely yours,

X

SHANE K. HOPKINS
#00253918 17A-L4
1181 Packdock Rd.
Smyrna, DELAWARE
19977-965

1 December 21, 2005

AGENT BRENDA WISE
FEDERAL BUREAU OF INVESTIGATION
920 N. KING STREET STE 104
WILMINGTON, DELAWARE 19801

Re: 3rd REQUEST: For Copy of INVESTIGATIVE REPORT

DEAR AGENT NISEI:

~~REAR + FRONT NICE:~~
I HAVE NOT RECEIVED A REPLY
TO MY PREVIOUS REQUESTS. PLEASE REVIEW
AND PROVIDE SAME. IT WOULD ALSO ASK OF
YOU TO PROVIDE ME WITH COPIES OF ALL INJURIES
REPORTS DONE ON DCC-SANGRANI IN THE PAST
3 YRS OR ASSUMMITS UPON INMATES BY GOVERN-
MENTAL OFFICES.*

THANK YOU FOR YOUR TIME IN THE ASSOCIATION.

xc: file

c: Colm F. Connolly Esq.
Clerk U.S. Dist. Ct. D. Del.

Enclosure(s): 5 Pages

*This is a 5 U.S.C.A. § 552 FOIA Request
Additional To my CASE.

Yours sincerely,
John Morris

1

SHANE K. HOPKINS
#00253918 17AH4
1181 JACKSON RD
SMYRNA, DELAWARE
PAPM-96

January 16, 2006

RECEIVED.

JAN 20 2006

Michael J. Sensor Esq.
ATNY AT law
P.O. Box 1568
Wilmington, Delaware 19899-1568

Re: ATTACHED AND REQUEST FOR REPRESENTATION

Dear Counsel:

I would ask you to review the enclosed and consider taking my case in that my case shows and conveys a pattern of inhumane acts that are of the same nature as the Wilson case. What's more not only will you get a class action based lead client all of the other 50+ inmates who filed up under 02-22 w/ACLU will also become clients.

Thank you for your time in the manner aforesaid and notify me accordingly.

cc: file

ATTACHMENTS(1) Complaint

NOTE: I'm sending via another to save on postage...

X Shane Hopkins
SHANE K. HOPKINS

SHANE K. HOPKINS
#00253918 17A-L4
1181 FADDELL RD
SOMERDALE, DELAWARE
302770-9

JANUARY 24, 2006

✓
Stephen A. Hampton Esq.
GRADY & HAMPTON, J.C.
6 North Bradford STREET
DOVER, DELAWARE 19904

Re: ATTACHED And Request for Representation

Dear Counsel:

Please review the ATTACHED Complaint and NOTIFY me of your INTENT TO EXCEPT my CASE for REPRESENTATION. I have also enclosed follow-ups filed beyond the 12-15-05 docketing/Complaint. THANK you for your time and consideration herein.

xc file

ATTACHMENTS: (1) Copy Complaint 05-870
(1) 10-20-05 Affidavit
(1) 11-18-05 follow-ups
(1) 12-27-05 3rd Reg.
(1) 1-24-06 Article ~~DETRO~~

Sincerely yours

X
Shane K. Hopkins
#00253918 17A-L4
1181 Fallock Rd
Mymre, DE 19960
1997

January 17, 2006

Michael Sensor Esq.
ATTY AT LAW
First Federal Plaza
Ste. 560
Wilmington, Delaware

19899-1568

Re: ATTACHED

RECEIVED

JAN 20 2006

Dear Counsel:

I AM AN INMATE PARALEGAL II AND
I AM IN THE UNIT THAT James Wilson WAS IN.

Since The 12-2-05 ARTICLE IVE ATTEMPTED
TO GET YOUR ADD. AND PUT TOGETHER SOME MATERIALS
THAT HAVE A PARALLEL THAT SHOULD NOT BE OVER-LOOKED
BECAUSE THEY REPRESENT THE ON-GOING INSUBORDANT
ACTS THAT CONTRADICT ANY DEFENSE THE STATE CAN
PRODUCE AGAINST WHY YOUR CLIENT DIED. NAMELY
OF Guards AND OTHERS WERE MOVED OUT OF THAT
UNIT A DAY AFTER THE INCIDENT., WHATS MORE THE
KEY TO YOUR ENTIRE CASE WILL BE THE Computer Read-
-outs of The Phone Records MADE, THAT AND 79AHL
3d1210 WILL ALLOW YOUR PICTURE TO BE MORE

(OVER)

Clear And The Accel. Issue is what's been
Surreptitiously documented since 2002
when this were beaten up by Guards.

I will close with one thing A go
Buddy of mine know's what happen that
day and this STATEMENTS Given to Police
don't believe a word. why! cause if you
GET ALL OF THE ENCLOSED, I will be out on
2-16-06 Level II AT OVER LEVEL IV MCI INST.
And I will be going into a law firm in
late May or June 2006 and I want, HAVE
REMAIN FILES, EXHIBITS ETC, THAT WILL ALLOW
SOME SERIOUS J.CTIONS TO BE FILED.
NOTIFY ME ACCORDINGLY

xc: file

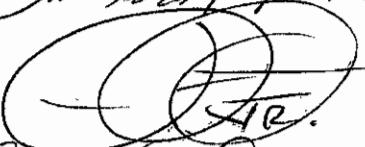
ATTACHMENT: (1) 1-13-06

LETTER TO ACCL.

(1) AFFIDAVIT

(1) REFERAL CASE
FOR REF. (NOTE)

PLEASE RESPOND TO
MR HOPKINS

Sincerely yours,
X 

KARA A. E. PROCTOR, JR.,
#00163750 17AUS
1181 Rocklock Rd
Springfield, DE 17361
1997-981

August 12, 2005

Done SENT FOR Copies
8-9-05 ✓

DREWRY NASH FENNELL Esq.,
 EXECUTIVE DIRECTOR
 ACLU. of DELAWARE
 100 West 10th Street Suite 309
 Wilmington, DELAWARE 19801

Re: Submissions And Non-Replys To Specific Questions

Dear Counsel:

ON 6-13-05 I WROTE YOU CONCERNING 02-22
 file Submissions, You did NOT Respond To my Request
 of The Current Status Thereof And You did NOT Provide
 ME With Copies of Previous Submissions or What
 Follow-ups WERE done in Relation Thereto.

ON 7-2-05 I WROTE CONCERNING THE CURRENT
 Addresses of Judith Mullen Esq. Whom You Replaced
 IN 2004, You did NOT Respond To my Requests, but
 IN A VAGARIE SubORDANTS Reply on 7-13-05, which
 TOTALLY WAS NON-RESPONSIVE TO ANY of my 7-2-05
 QUESTIONS) PRESENTED THEREIN UNLESS.

Within 15 days of RECEIPT of this letter I
 would REQUEST You, ~~NOT~~ To Reply To my Issues PRESENTED
 IN my PAST Submissions Aforesaid, Your failure to do so
 Will RESULT in A Complaint Against You With The ODC. You
 ARE Playing Games With Peoples Lives AND HAVE Incurred
 Numerous Del. Rule Professional Responsibility Code of
 (A/B/C)

Peoples Benefit Services, Inc.
Valley Forge, Pennsylvania 19493

Forwarding Service Requested

Ron Proctor JR
Ste 17au5
1181 Paddock Rd
Smyrna, DE 19977

Reflects payments through 07/28/05

*** BILLING SUMMARY ***

Amount Due	\$ 7.95
Credit on Account	
Total Amount Due	\$ 7.95

Please pay by 08/07/2005

THIS IS A BILL

To keep your coverage in force, please pay your premium by the due date.

Policy/Membership Number	Insured Name	Type of Coverage	Payment Mode	Coverage From	Period To	Amount Due
039L-9NL0	Ron Proctor JR	Health Plan	Monthly	08/07/05	09/06/05	\$7.95

Thank you for purchasing additional coverage. This is the premium due for your new coverage.

Conduct Violations THAT Will be Presented Accordingly
AND Vigorously Prosecuted both STATE AND FEDERAL
CIVIL & CRIM. VIOLATIONS.

THANK YOU FOR YOUR PROMPT ATTENTION IN THE
MANNER HEREIN.

xc: file

Attn: Connolly Esq. U.S. ATTY.

MAILED: _____

Registered Mail

Sincerely yours

X

Shane K. Hopkins

#50 — — — — —
1181 Paddock Rd
Smyrna, DE 19977

For customer service inquiries or to start an **Easy Payment Plan** by using your credit card or checking account, please call 1-(800) 667-6914. General correspondence should be sent to Customer Service, PO Box 1343, Valley Forge, PA 19482-1343

A001534

96102

DETACH HERE

RETURN THIS PORTION WITH YOUR PAYMENT-PLEASE MAKE SURE OUR COMPANY ADDRESS
APPEARS IN THE ENVELOPE WINDOW

Ron Proctor JR
Ste 17au5
1181 Paddock Rd
Smyrna, DE 19977

Policy/Membership number(s): 039L-9NL0

AMOUNT ENCLOSED

Amount Due:

\$7.95

Make check payable to:
Peoples Benefit Services, Inc.

COMPLETE BELOW FOR CHANGE OF ADDRESS

Peoples Benefit Services, Inc.
P.O. BOX 830020
Baltimore, MD 21283-0020

1000031905675443030100000000000079501

In the United States District Court
for the District of Delaware

Share K. Hopkins
Plaintiff

v.
John Henry et al. C. No. 05-870-SLR
Defendants

MOTION FOR APPOINTMENT OF COUNSEL

Comes now Plaintiff Share K. Hopkins in the
In the above styled cause pursuant to 28 USC
§ 1915(e)(1) & 1915(d) to appoint Counsel in foregoing proceeding
that would therefore show:

1.) This action is now ripe for
appointment of Counsel due to the ability
of Plaintiff to prosecute the case at bar

OBRA

(2)

Due to Plaintiff's Current ~~Health~~ ^{INCARCERATION} and Ability to Share the Cost in Both Responseness to the Proceeding In Both Discovery and Pre-Trial Preparations, in which Plaintiff's Cost Relies on the Merits of the Action. That is Class Certification ^{"Fed. Rule C.I. Procedures Rule 33"} and Ability to ³³ dispose of witnesses and present a Please claim that only a Jury can resolve based upon the current pleading filed by the Counsel for defendant on May 26, 2006 ^{See 2nd Am."}

2.) This action is a Class Certification Against Both the State of Delaware and the A.C.L.U. (American Civil Liberties Union) The Issues are Both Class Certification and ongoing 42 USC § 1995(e) (R.I.P.A. Violations that Currently Being a Part of The Federal Inquiry ~~Conducted~~ by the U.S. United States Department of Justice Civil Rights Division. (See Exhibits B)

3.) Plaintiff is Indigent and unable to afford counsel (See Exhibits "D")

(3)

4.) Plaintiff's Imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex and will require significant research and investigation. Plaintiff limited access to the law library and currently has limited retaliatory nexus to these proceedings by the law librarian Brian Engen who has monitored the proceedings and instituted incidents that present a denial of access to these current filings. See (Exhibits ~~1~~)

5.) A trial in this case will likely involve conflicting testimony and counsel would better enable Plaintiff to present evidence and cross examine witnesses and maintain/hold or have possessionary control of other inmates affidavits, exhibits etc. due to Dept. of Corrections Policies

over

6.) Plaintiff is currently still being held in administrative due to classification decisions relative thereto under. (See Exhibit "E")

7.) The foregoing are factors listed in Montgomery v. Puchak 294 F.3d 492, 499 (3rd Cir 2002.)

Wherefore Plaintiff Submit
This Action for Review for appointment
of Counsel Before the Court Review
Proceed hence forth

Respectfully yours

Oral _____

X
Shane F. B. Kerr

PS. don't forget to do
C.R. & D.O.T. of Service —
on. Dept. of Justice
and A.L.C.U.